

**35 U.S.C. § 102 - Hunte (US 4,937,499)**

Claims 1-11 are rejected under 35 U.S.C. § 102(b) as being anticipated by Hunte (US 4,937,499). Applicant respectfully traverses the rejection of all Claims based on Hunte (US 4,937,499).

The Examining Attorney contends that Hunte discloses “an electrical source” (described as the “left hand side of 156 in Fig. 5”), “an equalizer hub” (oppositely described as the “right hand side of 156 in Fig. 5”), “light fixtures . . . of uniform length”, “a transformer”, and that Figure 5 “shows the wiring configuration as disclosed in the claimed limitations.” Applicant respectfully submits that Hunte fails to disclose all of the above, specifically: (1) an equalizer hub; (2) light fixtures having lead wires of uniform length; and (3) the wiring configuration as disclosed in the claimed limitations.

**Equalizer Hub**

Applicant believes that the Examining Attorney’s reference to the “right hand side of 156 in Fig. 5” when discussing the equalizer hub indicates element (158) and the attached wires. Reference to the specification of Hunte shows that element (158) is a full bridge rectifier (col. 5, line 27). Sources on the internet indicate that a full bridge rectifier is an arrangement of diodes designed to recover a portion and/or all of a cycle of alternating current, i.e., the negative portion of a sine wave depicted on an oscilloscope. (See Exhibits A and B) Element (158) is not an electrical connection hub designed to allow multiple connections to a single home run wire as described in the inventive method. In fact, Element (158) has merely one input terminal and one output terminal. The schematic wires connected to Element (158) at the top and bottom represent positive and negative leads coming from the transformer. The schematic wires connected to Element (158) at the right and left sides represent positive and negative leads running to the rest of the electrical apparatus.

Alternatively, if the Examining Attorney’s reference to the “right hand side of 156 in Fig. 5”

indicates everything in the schematic between element (156) and the light bulbs (150a, 150b, and 150c), then Applicant submits that the drawing fails to depict connecting one or more light fixtures separately to the home run wire coming from the transformer. The drawing depicts a single positive lead and a single negative lead running from Element (158) to all of the light fixtures (150a, 150b, and 150c) collectively.

The equalizer hub disclosed in the application is a connection device which provides uniform voltage to each of a plurality of light fixtures connected to the hub. The uniformity of voltage is achieved through the creation of equal distances from the transformer to each of the light fixtures. The equalizer hub provides a common connection point which facilitates the addition and/or removal of light fixtures without disrupting the uniformity of voltage to the other light fixtures.

The instant invention teaches the use of a single positive lead and a single negative lead running to each light fixture separately. In the preferred embodiment, each light fixture (30) is coupled directly to a home run wire (14) without passing through another connection or fixture. (Specification, page 7, lines 9-10) Such arrangement reduces the number of connections and/or electrical devices between the electrical source and the light fixture, which may result in a voltage drop. Minimizing the possible points of voltage drop results in more uniform and equal voltage to each of the light fixtures.

#### **Uniform Length Lead Wires**

Concerning the disclosure of “light fixtures [having] uniform length”, the Examining Attorney cites to no portion of the disclosure in Hunte which discusses a length of the lead wires and the Applicant can find no such discussion. Applicant believes that the Examining Attorney is referring to Figure 5 for the proposition that the “light fixtures [are] of uniform length.” Respectfully, the Applicant believes that the Examining Attorney confuses the lines shown in the

schematic drawing with scaled lines representing distance. There is nothing in the specification, the schematic drawing itself, or the commonly accepted practice of electrical schematic drawings to indicate that any of the lines in Fig. 5 represent specific or uniform distances. Indeed, no language in the specification concerning the schematic of Fig. 5 deals with any dimensions or uniform distances at all. If the length of the lines in the schematic are taken as dimensions, the diodes (CR1, CR2, CR3, and CR4) in element 158 would be only slightly smaller than the light bulbs (150a, 150b, and 150c) and the amplifier (170) would be much bigger than the light bulbs (150a, 150b, and 150c). In actuality, the diodes and the amplifiers are small electronic devices which are designed to attach to the surface of a silicon wafer.

### **Wiring Configuration**

Finally, the schematic in Fig. 5 fails to disclose the wiring configuration disclosed or claimed in the instant invention. The schematic in Fig. 5 depicts each of the light bulbs sharing the same leads running from the power source and shows many electrical connections between the power source and the light bulbs. As discussed in the specification and above, each electrical connection provides a point at which voltage drop may occur, and even one additional connection teaches away from the instant invention.

### **Claim Rejections**

#### **Claim 1**

Applicant respectfully submits that, in light of the above, claim 1 is allowable over the prior art. The cited prior art does not disclose all of the claimed limitations of claim 1. The equalizer hub as claimed in claim 1 and described in the specification does not exist in the cited prior art, or any other prior art reference. Applicant respectfully traverses the Examining Attorney's rejection of Claim 1. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 2**

Claim 2 is directly dependent from Claim 1, which Applicant submits is in condition for allowance, and adds the limitation of a transformer between the electrical source and the equalizer hub. Accordingly, with Claim 1 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 2 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 2. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 3**

Claim 3 is directly dependent from Claim 2, which Applicant submits is in condition for allowance, and adds the limitation of a homerun wire from the transformer to the equalizer hub. Accordingly, with Claim 2 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 3 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 3. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 4**

Claim 4 is directly dependent from Claim 1, which Applicant submits is in condition for allowance, and adds the limitation of a wire lead on each of the one or more light fixtures connected to the equalizer hub. Accordingly, with Claim 1 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 4 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 4. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 5**

Claim 5 is directly dependent from Claim 4, which Applicant submits is in condition for allowance, and adds the limitation of each of the wire leads being of uniform length. Accordingly, with Claim 4 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 5 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 5. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 6**

Claim 6 is directly dependent from Claim 1, which Applicant submits is in condition for allowance, and adds the limitation of two or more connectors in the equalizer hub being connected to the electrical source. Accordingly, with Claim 1 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 6 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 6. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 7**

Claim 7 is directly dependent from Claim 6, which Applicant submits is in condition for allowance, and adds the limitation of connecting the connectors in the equalizer hub to the one or more light fixtures. Accordingly, with Claim 6 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 7 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 7. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 8**

Applicant respectfully submits that, in light of the above, claim 8 is allowable over the prior art. The cited prior art does not disclose all of the claimed limitations of claim 8. The equalizer hub as claimed in claim 8 and described in the specification does not exist in the cited prior art, or any other prior art reference. Applicant respectfully traverses the Examining Attorney's rejection of Claim 8. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 9**

Claim 9 is directly dependent from Claim 8, which Applicant submits is in condition for allowance, and adds the limitation of a homerun wire from the transformer to the equalizer hub. Accordingly, with Claim 8 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 9 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 9. Applicant respectfully requests that a notice of allowance be issued.

### **Claim 10**

Claim 10 is directly dependent from Claim 8, which Applicant submits is in condition for allowance, and adds the limitation of each of the wire leads being of uniform length. As discussed above, the prior art does not disclose the connection of multiple light fixtures to a hub where each of the light fixtures have wire leads that are of uniform length. Accordingly, with Claim 8 being in condition for allowance based upon the above and the additional limitation not disclosed in the prior art, dependent Claim 10 is allowable over the prior art. Applicant respectfully traverses the Examining Attorney's rejection of Claim 10. Applicant respectfully requests that a notice of

allowance be issued.

**Claim 11**

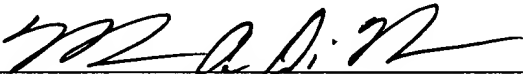
Applicant respectfully submits that, in light of the above, claim 11 is allowable over the prior art. The cited prior art does not disclose all of the claimed limitations of claim 11. The equalizer hub as claimed in claim 11 and described in the specification does not exist in the cited prior art, or any other prior art reference. Applicant respectfully traverses the Examining Attorney's rejection of Claim 11. Applicant respectfully requests that a notice of allowance be issued.

**CONCLUSION**

In light of the above statements, Applicant respectfully requests reconsideration and allowance of all pending claims. The Examiner is invited to contact Applicant's attorney if an interview would expedite prosecution of this matter.

Respectfully submitted,

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